

Federal Defenders
OF NEW YORK, INC.

Southern District
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May 15, 2024

BY ECF

Hon. Gary Stein
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

**RE: United States v. Jose Lopez
24 Mag 1431 (UA)**

Dear Judge Stein:

I write, as counsel for Jose Lopez, to respectfully request a modification of the bail conditions in the above-captioned matter. The government consents to this request.

On May 6, 2024, Mr. Lopez was presented in Magistrate Court. Following a contested detention hearing, Your Honor set the following bail conditions:

\$100,000 personal recognizance bond to be co-signed by two financially responsible persons; compliance with pretrial services supervision as directed; drug testing and treatment as directed by pretrial services; mental health treatment as directed by pretrial services; home incarceration enforced by GPS location monitoring; Mr. Lopez's uncle to serve as third party custodian; surrender all travel documents with travel restricted to the Southern and Eastern Districts of New York; cannot possess a firearm, destructive device or other weapons.

Mr. Lopez was ordered detained until all conditions are met.

Since Mr. Lopez's presentment, the defense put forward two financially responsible persons as cosigners to his bond. On May 14, the government approved the two cosigners.

At Mr. Lopez's presentment, the defense proposed that he reside in the Bronx, with his uncle to serve as the third party custodian; the Court adopted this condition. Since then, we have learned that Mr. Lopez's uncle does not qualify as a third party custodian. Accordingly, Mr. Lopez respectfully requests a bail modification to allow Alvis Molina, who the government has approved as a financially responsible cosigner, to serve as Mr. Lopez's third party custodian. Mr. Lopez

would reside with Mr. Molina at his home in Patterson, NJ, where Mr. Molina lives with his mother and brother (the second financially responsible cosigner). The defense further requests that the Court modify Mr. Lopez's travel restrictions to allow travel to the District of New Jersey (in addition to the Southern and Eastern Districts of New York), where he would reside. All other conditions—including home incarceration—would remain the same. The government consents to this request.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

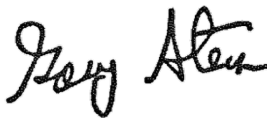
Marne L. Lenox, Esq.

Counsel for Jose Lopez

cc: Daniel Roque, Assistant U.S. Attorney

Application granted. The requested modifications to Mr. Lopez's bail conditions are approved. SO ORDERED.

Date: May 15, 2024
New York, New York

A handwritten signature in black ink, appearing to read "Gary Stein", is positioned above the printed name and title.

Gary Stein
United States Magistrate Judge
Southern District of New York